

Exhibit A

STERN & EISENBERG, PC
1581 MAIN STREET, SUITE 200
THE SHOPS AT VALLEY SQUARE
WARRINGTON, PA 18976
TELEPHONE: (215) 572-8111
FACSIMILE: (215) 572-5025
(COUNSEL FOR PLAINTIFF)

**IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA
FOR PHILADELPHIA COUNTY**

Velocity Commercial Capital Loan trust 2023- RTL1
Plaintiff

v.

Bernadette Ferrell A/K/A Bernadette M. Ferrell
and
Joseph Flood III A/K/A Joseph M. Flood III
Defendants

Civil Action No.: 240300458

MORTGAGE FORECLOSURE

PRAECIPE FOR ENTRY OF JUDGMENT AND ASSESSMENT OF DAMAGES

TO THE PROTHONOTARY:

Enter judgment in favor of Plaintiff and against Defendants, Bernadette Ferrell A/K/A Bernadette M. Ferrell and Joseph Flood III A/K/A Joseph M. Flood III , Pursuant to order granting Summary Judgment dated January 13, 2025, a copy of which is attached.

PER ORDER..... \$358,990.62

ACCRUED INTEREST after November 30, 2024, shall accrue at the per diem rate of
\$2,625.00, to January 31, 2025 \$5,250.00

TOTAL THROUGH DATE OF REQUEST FOR JUDGMENT..... \$364,240.62

STERN & EISENBERG, PC

By:

Caroline Aprahamian

- ☐ Andrew J. Marley, Esquire (312314),
- ☐ Jessica N. Manis, Esquire (318705),
- ☐ Daniel P. Jones, Esquire (321876),
- ☐ Matthew C. Fallings, Esquire (326896),
- ☐ Kenya Bates, Esquire (203664),
- ☒ Caroline P. Aprahamian, Esquire (329932)

Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Phone: (215) 572-8111
Facsimile: (215) 572-5025
qc-pa@sterneisenberg.com

FILED

05 DEC 2024 09:37 am

Civil Administration

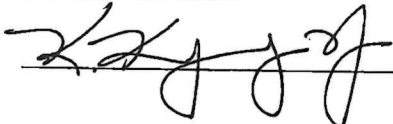
**IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA
FOR PHILADELPHIA COUNTY**

Velocity Commercial Capital Loan Trust 2023-RTL1 Plaintiff v. Bernadette Ferrell A/K/A Bernadette M. Ferrell and Joseph Flood III A/K/A Joseph M. Flood III Defendant(s).	Civil Action Number: 240300458
--	--------------------------------

ORDER GRANTING SUMMARY JUDGMENT

AND NOW, this 13th day of January, 2025, upon consideration of Plaintiff's Motion for Summary Judgment, its Memorandum of Law submitted in support thereof, and any opposition which may have been filed to same, it is hereby ORDERED that Plaintiff's Motion is granted. Judgment in rem is hereby entered in favor of the Plaintiff, Velocity Commercial Capital Loan Trust 2023-RTL1, and against the Defendant, Bernadette Ferrell A/K/A Bernadette M. Ferrell and Joseph Flood III A/K/A Joseph M. Flood III, in the amount of \$358,990.62, which amount is good through November 30, 2024, plus interest at the contract rate.

BY THE COURT:


J.

WSJDM-Velocity Commercial Capital Loan Trust 2023-RU1 V [JNS]



24030045800033

Case ID: 240300458
Control No.: 24121284

STERN & EISENBERG, PC
1581 MAIN STREET, SUITE 200
THE SHOPS AT VALLEY SQUARE
WARRINGTON, PA 18976
TELEPHONE: (215) 572-8111
FACSIMILE: (215) 572-5025
(COUNSEL FOR PLAINTIFF)

**IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA
FOR PHILADELPHIA COUNTY**

Velocity Commercial Capital Loan trust 2023-
RTL1

Plaintiff

v.

Bernadette Ferrell A/K/A Bernadette M. Ferrell
and
Joseph Flood III A/K/A Joseph M. Flood III
Defendants

Civil Action No. : 240300458

MORTGAGE FORECLOSURE

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA

:

: S.S. :

COUNTY OF BUCKS

:

I, the undersigned, being duly sworn according to law, deposes and says, to the best of his knowledge, information and belief, Defendants':

1. Last-known address is; 3379 Elliston Circle, Philadelphia, PA 19114
2. Is over the age of twenty-one; and
3. Is not now nor has been within the last three hundred sixty-six days in the Armed Services of the United States as defined in the Soldiers' Civil Relief Act of 1940, as amended.

STERN & EISENBERG, PC

By: Caroline Aprahamian

Sworn to and subscribed before me
this 16th Day of February, 2025.

Michelle A. Lucas
Notary Public

Commonwealth of Pennsylvania - Notary Seal
Michelle A. Lucas, Notary Public
Bucks County
My Commission Expires December 7, 2027
Commission Number 1437490

- ☐ Andrew J. Marley, Esquire (312314),
 - ☐ Jessica N. Manis, Esquire (318705),
 - ☐ Daniel P. Jones, Esquire (321876),
 - ☐ Matthew C. Fallings, Esquire (326896),
 - ☐ Kenya Bates, Esquire (203664),
 - ☒ Caroline P. Aprahamian, Esquire (329932)
- Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Phone: (215) 572-8111
Facsimile: (215) 572-5025
qc-pa@sterneisenberg.com



Status Report
Pursuant to Servicemembers Civil Relief Act

SSN: XXX-XX-9599
 Birth Date:
 Last Name: FLOOD III
 First Name: JOSEPH
 Middle Name: M
 Status As Of: Feb-06-2025
 Certificate ID: 5663PSHW4HNR12F

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty.

Sam Yousefzadeh

Sam Yousefzadeh, Director
 Department of Defense - Manpower Data Center
 4800 Mark Center Drive, Suite 04E25
 Alexandria, VA 22350



Status Report
Pursuant to Servicemembers Civil Relief Act

SSN: XXX-XX-9599
Birth Date:
Last Name: FLOOD
First Name: JOSEPH
Middle Name: M
Status As Of: Feb-06-2025
Certificate ID: D029CBSSWSMTNX5

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty.

Sam Yousefzadeh

Sam Yousefzadeh, Director
Department of Defense - Manpower Data Center
4800 Mark Center Drive, Suite 04E25
Alexandria, VA 22350



Status Report
Pursuant to Servicemembers Civil Relief Act

SSN: XXX-XX-9599
 Birth Date:
 Last Name: FLOOD
 First Name: JOSEPH
 Middle Name:
 Status As Of: Feb-06-2025
 Certificate ID: V9VNBVD8PQP8J34

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty.

Sam Youssefzadeh

Sam Youssefzadeh, Director
 Department of Defense - Manpower Data Center
 4800 Mark Center Drive, Suite 04E25
 Alexandria, VA 22350



Status Report Pursuant to Servicemembers Civil Relief Act

SSN: XXX-XX-9599
Birth Date:
Last Name: FLOOD III
First Name: JOSEPH
Middle Name:
Status As Of: Feb-06-2025
Certificate ID: 6Y1XF00LSCFWN5Y

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty.

Sam Yousefzadeh

Sam Yousefzadeh, Director
Department of Defense - Manpower Data Center
4800 Mark Center Drive, Suite 04E25
Alexandria, VA 22350



Status Report Pursuant to Servicemembers Civil Relief Act

SSN: XXX-XX-8090
Birth Date:
Last Name: FERRELL
First Name: BERNADETTE
Middle Name:
Status As Of: Feb-06-2025
Certificate ID: MZ8J160WV8B1Y4L

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty.

Sam Yousefzadeh

Sam Yousefzadeh, Director
Department of Defense - Manpower Data Center
4800 Mark Center Drive, Suite 04E25
Alexandria, VA 22350

STERN & EISENBERG, PC
1581 MAIN STREET, SUITE 200
THE SHOPS AT VALLEY SQUARE
WARRINGTON, PA 18976
TELEPHONE: (215) 572-8111
FACSIMILE: (215) 572-5025
(COUNSEL FOR PLAINTIFF)

**IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA
FOR PHILADELPHIA COUNTY**

Velocity Commercial Capital Loan trust 2023-
RTL1

Plaintiff

v.

Bernadette Ferrell A/K/A Bernadette M. Ferrell
and
Joseph Flood III A/K/A Joseph M. Flood III
Defendants

Civil Action No. : 240300458

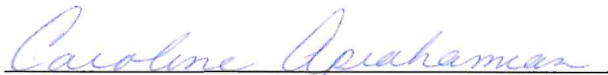
MORTGAGE FORECLOSURE

CERTIFICATION UNDER RULE 237.1

I, the undersigned attorney on the writ and attorney for Plaintiff, hereby certify that no ten-day notice of intention to enter judgment was needed as the court issued a motion for summary judgment on January 13, 2025.

STERN & EISENBERG, PC

By:



- ☐ Andrew J. Marley, Esquire (312314),
- ☐ Jessica N. Manis, Esquire (318705),
- ☐ Daniel P. Jones, Esquire (321876),
- ☐ Matthew C. Fallings, Esquire (326896),
- ☐ Kenya Bates, Esquire (203664),
- ☒ Caroline P. Aprahamian, Esquire (329932)

Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Phone: (215) 572-8111
Facsimile: (215) 572-5025
qc-pa@sterneisenberg.com

FILED

05 DEC 2024 09:37 am

Civil Administration

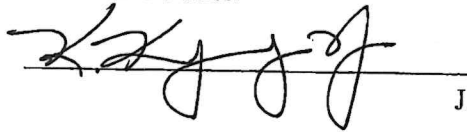
**IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA
FOR PHILADELPHIA COUNTY**

Velocity Commercial Capital Loan Trust 2023-RTL1 Plaintiff v. Bernadette Ferrell A/K/A Bernadette M. Ferrell and Joseph Flood III A/K/A Joseph M. Flood III Defendant(s).	Civil Action Number: 240300458
--	--------------------------------

ORDER GRANTING SUMMARY JUDGMENT

AND NOW, this 13th day of January, 2025, upon consideration of Plaintiff's Motion for Summary Judgment, its Memorandum of Law submitted in support thereof, and any opposition which may have been filed to same, it is hereby ORDERED that Plaintiff's Motion is granted. Judgment in rem is hereby entered in favor of the Plaintiff, Velocity Commercial Capital Loan Trust 2023-RTL1, and against the Defendant, Bernadette Ferrell A/K/A Bernadette M. Ferrell and Joseph Flood III A/K/A Joseph M. Flood III, in the amount of \$358,990.62, which amount is good through November 30, 2024, plus interest at the contract rate.

BY THE COURT:


J.

WSJDM-Velocity Commercial Capital Loan Trust 2023-RTL1 V (JNS)



24030045800033

Case ID: 240300458
Control No.: 24121284

STERN & EISENBERG, PC
1581 MAIN STREET, SUITE 200
THE SHOPS AT VALLEY SQUARE
WARRINGTON, PA 18976
TELEPHONE: (215) 572-8111
FACSIMILE: (215) 572-5025
(COUNSEL FOR PLAINTIFF)

**IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA
FOR PHILADELPHIA COUNTY**

Velocity Commercial Capital Loan trust 2023-
RTL1

Plaintiff

v.

Bernadette Ferrell A/K/A Bernadette M. Ferrell
and
Joseph Flood III A/K/A Joseph M. Flood III
Defendants

Civil Action No. : 240300458

MORTGAGE FORECLOSURE

CERTIFICATE UNDER ACT 91 OF 1983

It is hereby certified that the Sheriff's Sale scheduled in the above-captioned matter is not protected under the Homeowner's Emergency Assistance and Mortgage Foreclosure Act, P.L. 1688, No. 621 because notice, as required, was sent to Defendants and no timely response was made.

STERN & EISENBERG, PC

By:



- ☐ Andrew J. Marley, Esquire (312314),
- ☐ Jessica N. Manis, Esquire (318705),
- ☐ Daniel P. Jones, Esquire (321876),
- ☐ Matthew C. Fallings, Esquire (326896),
- ☐ Kenya Bates, Esquire (203664),
- ☒ Caroline P. Aprahamian, Esquire (329932)

Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Phone: (215) 572-8111
Facsimile: (215) 572-5025
qc-pa@sterneisenberg.com

STERN & EISENBERG, PC
1581 MAIN STREET, SUITE 200
THE SHOPS AT VALLEY SQUARE
WARRINGTON, PA 18976
TELEPHONE: (215) 572-8111
FACSIMILE: (215) 572-5025
(COUNSEL FOR PLAINTIFF)

**IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA
FOR PHILADELPHIA COUNTY**

Velocity Commercial Capital Loan trust 2023-
RTL1

Plaintiff

v.

Bernadette Ferrell A/K/A Bernadette M. Ferrell
and
Joseph Flood III A/K/A Joseph M. Flood III
Defendants

Civil Action No.: 240300458

MORTGAGE FORECLOSURE

CERTIFICATION OF ADDRESS

It is hereby certified that the last known addresses of the parties are as follows:

Velocity Commercial Capital Loan trust 2023-
RTL1
2945 Townsgate Road, Suite #110
Westlake Village, CA 91361
(Plaintiff)

Bernadette Ferrell A/K/A Bernadette M. Ferrell
3379 Elliston Circle
Philadelphia, PA 19114
and
Joseph Flood III A/K/A Joseph M. Flood III
3379 Elliston Circle
Philadelphia, PA 19114
and
Bernadette Ferrell A/K/A Bernadette M. Ferrell
1501 North 2nd Street
Unit 10
Philadelphia, PA 19122-3846
and
Bernadette Ferrell
428 Sepviva Street
Philadelphia, PA 19125
and
Joseph Flood III A/K/A Joseph M. Flood III
1501 North 2nd Street
Unit 10
Philadelphia, PA 19122-3846
And

Joseph Flood III A/K/A Joseph M. Flood III
428 Sepviva Street
Philadelphia, PA 19125
(Defendants)

STERN & EISENBERG, PC

By:



- ☐ Andrew J. Marley, Esquire (312314),
- ☐ Jessica N. Manis, Esquire (318705),
- ☐ Daniel P. Jones, Esquire (321876),
- ☐ Matthew C. Fallings, Esquire (326896),
- ☐ Kenya Bates, Esquire (203664),
- ☒ Caroline P. Aprahamian, Esquire (329932)

Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Phone: (215) 572-8111
Facsimile: (215) 572-5025
qc-pa@sterneisenberg.com

STERN & EISENBERG, PC
1581 MAIN STREET, SUITE 200
THE SHOPS AT VALLEY SQUARE
WARRINGTON, PA 18976
TELEPHONE: (215) 572-8111
FACSIMILE: (215) 572-5025
(COUNSEL FOR PLAINTIFF)

**IN THE COURT OF COMMON PLEAS OF PENNSYLVANIA
FOR PHILADELPHIA COUNTY**

Velocity Commercial Capital Loan trust 2023-
RTL1

Plaintiff

v.

Bernadette Ferrell A/K/A Bernadette M. Ferrell
and
Joseph Flood III A/K/A Joseph M. Flood III
Defendants

Civil Action No. : 240300458

MORTGAGE FORECLOSURE

NOTICE PURSUANT TO RULE 236

Notice is hereby given that a judgment in the above captioned matter has been entered against Defendants, Bernadette Ferrell A/K/A Bernadette M. Ferrell and Joseph Flood III A/K/A Joseph M. Flood III , on _____.

BY: _____

Deputy

If you have any questions concerning the above, please contact:

Stern & Eisenberg, PC
Attorney for Plaintiff
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Telephone: (215) 572-8111